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*Proposed Counsel to the Official Committee  
of Unsecured Creditors of Rudolph W. Giuliani*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	: <b>Chapter 11</b>
	:
<b>RUDOLPH W. GIULIANI</b>	: <b>Case No. 23-12055 (SHL)</b>
<b>a/k/a RUDOLPH WILLIAM GIULIANI,</b>	:
	:
<b>Debtor.</b>	:
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**CERTIFICATE OF NO  
OBJECTION TO JOINT MOTION OF THE  
DEBTOR AND THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ORDER APPROVING STIPULATION CONCERNING  
DEADLINE FOR CREDITORS TO CHALLENGE DISCHARGEABILITY OF DEBTS**

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Rules”), the above-captioned debtor (the “Debtor”) and the Official Committee of Unsecured Creditors appointed in the Debtor’s chapter 11 case (together, the “Parties”), hereby certify as follows:

1. On March 1, 2024, the Parties filed the *Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for Order Approving Stipulation Concerning Deadline for*

*Creditors to Challenge Dischargeability of Debts* [Docket No. 133] (the “Motion”). On March 5, 2024, the Parties filed the *Joint Motion of the Debtor and the Official Committee of Unsecured Creditors to Schedule an Expedited Hearing and Shorten the Notice Period with Respect to the Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for Order Approving Stipulation Concerning Deadline for Creditors to Challenge Dischargeability of Debts* [Docket No. 134] (the “Motion to Shorten”) seeking to shorten the notice period for, and set an expedited hearing on, the Motion. On March 6, 2024, the Court entered an order [Docket No. 137] (the “Order”) granting the Motion to Shorten.

2. Pursuant to the Order, objections or responses to the Motion were required to be filed and served by 4:00 p.m. (prevailing Eastern Time) on March 8, 2024 (the “Objection Deadline”). Local Rule 9075-2(c) provides that a motion or an application, as applicable, may be granted without a hearing, provided that, after the passage of the objection deadline, the movant submits a proposed order granting the motion or application, as applicable, to the Court along with a certificate that no objection or other response has been filed or served.

3. The Objection Deadline has passed, and to the best of the knowledge of the undersigned proposed counsel to the Parties, no objection with respect to approval of the Motion has been filed on the docket of the Debtor’s chapter 11 case or served on the proposed counsel to the Parties. In accordance with Local Rule 9075-2, this certificate of no objection is being filed at least forty-eight hours after the expiration of the Objection Deadline.

4. Accordingly, the Parties respectfully request entry of the proposed order attached hereto as **Exhibit A**, at the Court’s earliest convenience. If the proposed order is not entered prior to the hearing, then the Parties will seek entry of the proposed order at the hearing scheduled for

March 13, 2024 at 10:00 a.m. (prevailing Eastern Time) before the Honorable Sean H. Lane,  
United States Bankruptcy Judge for the Southern District of New York.

Dated: March 11, 2024  
New York, New York

By: /s/ Philip C. Dublin

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*Proposed Counsel to the Official Committee  
of Unsecured Creditors of Rudolph W. Giuliani*

Dated: March 11, 2024

/s/ Heath S. Berger

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*Proposed Attorneys for the Debtor*

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**In re:** : **Chapter 11**  
:   
**RUDOLPH W. GIULIANI** : **Case No. 23-12055 (SHL)**  
**a/k/a RUDOLPH WILLIAM GIULIANI,** :   
: **Re: Docket Nos. 133, 134, 137**  
**Debtor.** :   
-----X

**ORDER APPROVING STIPULATION CONCERNING DEADLINE  
FOR CREDITORS TO CHALLENGE DISCHARGEABILITY OF DEBTS**

Upon the motion (the “Motion”)<sup>1</sup> of the Debtor and the Committee for entry of an order extending the Dischargeability Challenge Deadline for cause for all creditors by sixty (60) days, through and including June 7, 2024; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this proceeding being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the necessary parties; and the Court having found that no other or further notice is necessary; and the Court having reviewed the Motion and the Stipulation; and the Court finding, based on the representations made in the Motion and the Stipulation that, pursuant to Bankruptcy Rule 4007(c), cause exists to extend the Dischargeability Challenge Deadline; and the Court having determined that the legal and factual bases set forth in the Motion and the Stipulation establish just cause for the relief granted herein; and the Court having found that the relief requested in the Motion is in the best interests of the Debtor’s estate and his unsecured creditors; and any objections to the relief requested in the Motion having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

1. The relief requested in the Motion is granted as set forth herein.
2. Pursuant to Bankruptcy Rule 4007(c), cause exists to extend the Dischargeability Challenge Deadline for all creditors by sixty (60) days, through and including June 7, 2024, and the Dischargeability Challenge Deadline shall be extended for all creditors by sixty (60) days, through and including June 7, 2024 (the “Extended Dischargeability Challenge Deadline”).
3. Upon agreement by the Debtor and the Committee, the Extended Dischargeability Challenge Deadline may be further extended through the submission of a further stipulation and proposed form of order (a “Further Order”), and any such further extension shall be effective as of the date of entry of the applicable Further Order.
4. Nothing herein shall prevent the Committee or any other party in interest from seeking to extend the Extended Dischargeability Challenge Deadline or any further extension thereof without the Debtor’s agreement by the filing of a motion for such relief.
5. The Committee and the Debtor are authorized to take all actions necessary to effectuate the relief granted pursuant to this order in accordance with the Motion.
6. The terms and conditions of this order shall be immediately effective and enforceable upon its entry.

7. The Court retains exclusive jurisdiction with respect to any disputes arising from, or other actions to interpret, administer or enforce the terms and provisions of, the Stipulation and this order.

Dated: \_\_\_\_\_

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE